

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
	§	Chapter 11
	§	
FIELDWOOD ENERGY LLC, et al.,	§	Case No. 20-33948 (MI)
	§	
Debtors.¹	§	(Jointly Administered)
	§	Re: Docket Nos. 563 & 564

**DEBTORS' AMENDED WITNESS AND EXHIBIT LIST
FOR HEARING ON NOVEMBER 24, 2020**

Fieldwood Energy LLC and its debtor affiliates in the above-captioned chapter 11 cases, as debtors and debtors in possession (collectively, the “**Debtors**”), file this amended witness and exhibit list (the “**Amended Witness and Exhibit List**”) for the hearing scheduled for **November 24, 2020 at 10:30 a.m. (prevailing Central Time)** (the “**Hearing**”) to consider the *Emergency Motion of the Debtors for Entry of an Order Extending the Automatic Stay to Certain of Debtors’ Co-Working Interest Owners* (ECF No. 563):

WITNESSES

The Debtors may call any of the following witnesses at the Hearing:

1. Michael T. Dane, Senior Vice President and Chief Financial Officer, Fieldwood Energy LLC;
2. Any witness called or listed by any other party; and
3. Any rebuttal witnesses.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors’ primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

EXHIBITS

The Debtors may offer into evidence any one or more of the following exhibits:

EXHIBIT NO.	DESCRIPTION	OFFERED	OBJECTION	ADMITTED	DATE
1.	Declaration of Michael T. Dane in Support of Emergency Motion of the Debtors for Entry of an Order Extending the Automatic Stay to Certain of Debtors' Co-Working Interest Owners (ECF No. 563-1) (the " Dane Declaration ")				
2.	Excerpts of Debtors' operating agreements with co-working interest owners Ecopetrol America, LLC (" Ecopetrol "), attached to the Dane Declaration as Exhibit A				
3.	Excerpts of Debtors' operating agreements with co-working interest owners Ridgewood Katmai, LLC, and ILX Prospect Katmai, LLC, attached to the Dane Declaration as Exhibit A				
4.	Debtors' October 26, 2018 Master Domestic Offshore Daywork Drilling Contract with Atlantic Maritime Services LLC (" Atlantic "), attached to the Dane Declaration as Exhibit B				
5.	Atlantic's November 13, 2020 <i>in rem</i> lawsuit against Ecopetrol, filed in the United States District for the Eastern District of Louisiana, attached to the Dane Declaration as Exhibit C				
6.	Atlantic's November 13, 2020 <i>in rem</i> lawsuit against Ridgewood Katmai, LLC, and ILX Prospect Katmai, LLC, filed in the United States District for the Eastern District of Louisiana, attached to the Dane Declaration as Exhibit C				
7.	Proposed Order granting relief requested (ECF No. 563-2)				
8.	Proposed Notice of Entry of Order Extending the Automatic Stay to Certain of the Debtors' Co-Working Interest Owners (ECF No. 563-3)				

EXHIBIT NO.	DESCRIPTION	OFFERED	OBJECTION	ADMITTED	DATE
9.	Atlantic's October 30, 2020 demand letter and statement of privilege to Ecopetrol America LLC				
10.	Ecopetrol's November 6, 2020 letter to Debtors demanding Debtors fulfill contractual indemnity obligations and address Atlantic's demands on Ecopetrol				
11.	Debtors' November 9, 2020 response letter to Atlantic's October 30, 2020 demand letter and statement of privilege to Ecopetrol				
12.	Any exhibit designated by any other party in connection with this hearing				
13.	Any exhibit necessary to rebut the evidence or testimony of any witness offered or designated by any other party in connection with this hearing				

The Debtors reserve the right to amend or supplement the Witness and Exhibit List at any time prior to the Hearing.

Dated: November 23, 2020
Houston, Texas

Respectfully submitted,

/s/ Alfredo R. Pérez
WEIL, GOTSHAL & MANGES LLP
Alfredo R. Pérez (15776275)
700 Louisiana Street, Suite 1700
Houston, Texas 77002
Telephone: (713) 546-5000
Facsimile: (713) 224-9511
Email: Alfredo.Perez@weil.com

-and-

WEIL, GOTSHAL & MANGES LLP
Matthew S. Barr (admitted *pro hac vice*)
Jessica Liou (admitted *pro hac vice*)
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007
Email: Matt.Barr@weil.com
Jessica.Liou@weil.com

-and-

JONES WALKER, LLP
Joseph E. Bain (24085187)
Email: jrbain@joneswalker.com
Joshua A. Norris (24027577)
Email: jnorris@joneswalker.com
James W. Noe (24040178)
Email: jnoe@joneswalker.com
Daniel J. Baldwin (24078184)
Email: dbaldwin@joneswalker.com
811 Main St., Suite 2900
Houston, TX 77002
Telephone: 713.437.1800
Facsimile: 713.437.1810

*Attorneys for Debtors
and Debtors in Possession*

Certificate of Service

I hereby certify that, on November 23, 2020, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Alfredo R. Pérez

Alfredo R. Pérez